

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,

Plaintiff,

v.

THE AMERICAN INSURANCE COMPANY,
et. al,

Defendants.

Case No. 1:19-cv-00010-JTN-ESC

Honorable Janet T. Neff
Mag. Judge Sally J. Berens
Special Master Paula Manderfield

ORAL ARGUMENT REQUESTED

**INSURERS' MOTION TO COMPEL PRODUCTION OF UNDERLYING LITIGATION
BUDGETS AND RELATED MATERIALS CONCERNING CLAIMED DEFENSE
COSTS**

Pursuant to F.R.C.P. 37(a)(3)(A) and (B), Insurers move for an order compelling Wolverine to produce litigation budget documents bearing directly on the reasonableness and necessity of the alleged defense costs Wolverine seeks in this matter, as well as the classification of those costs as either defense, indemnity, or business-related.

Respectfully submitted,

/s/ Carole D. Bos

Carole D. Bos
BOS & GLAZIER PLC
990 Monroe Ave., NW
Grand Rapids, MI 49503
(616) 458-6814
cbos@bosglazier.com
bglazier@bosglazier.com

Brian C. Coffey
COHN BAUGHMAN & MARTIN
333 W Wacker Dr., Ste. 900
Chicago, IL 60606
(312) 775-3900
brian.coffey@mclolaw.com

Daniel F. Gourash (Ohio Bar No. 0032413)
Robert D. Anderle (Ohio Bar No.0064582)
Seeley, Savidge, Ebert & Gourash, Co.,
LPA

26600 Detroit Road, Third Floor
Cleveland, Ohio 44145

Ph: 216-566-8200

Fax: 216-566-0213

dfgourash@sseg-law.com

rdanderle@sseg-law.com

***Attorneys for Defendants Century
Indemnity Company, as successor to CCI
Insurance Company, as successor to
Insurance Company of North America,
Pacific Employers Insurance Company,
and Federal Insurance Company***

s/Patrick E. Winters

Charles W. Browning

Patrick E. Winters

Drew L. Block

PLUNKETT COONEY

38505 Woodward Avenue, Suite 100

Bloomfield Hills, MI 48304

(248) 901-4000; (248) 901-4040 (Fax)

cbrowning@plunkettcooney.com

pwinters@plunkettcooney.com

dblock@plunkettcooney.com

***Attorneys for Defendant/Counter-Claimant
The Travelers Indemnity Company and
Counter-Claimants The Travelers
Indemnity Company of Illinois n/k/a
Travelers Property Casualty Company of
America, Northfield Insurance Company,
St. Paul Fire and Marine Insurance
Company, The Aetna Casualty and Surety
Company n/k/a Travelers Casualty and
Surety Company and Travelers Property
Casualty Company of America***

s/Bradford S. Moyer

Bradford S. Moyer
Stephanie M. Brochert
PLUNKETT COONEY
Bridgewater Place
333 Bridge N.W., Suite 530
Grand Rapids, MI 49504
(269) 382-5935
bmoyer@plunkettcooney.com
sbrochert@plunkettcooney.com
***Attorneys for Defendant The American
Insurance Company***

s/Michael J. Cohen

Michael J. Cohen
Pamela J. Tillman
MEISSNER TIERNEY FISHER &
NICHOLS S.C.
111 E. Kilbourn Ave., Ste. 1900
Milwaukee, WI 53202
414) 273-1300
mjc@mtfn.com
pjt@mtfn.com

Daniel Johnson James
Gary A. Maximiuk
WHEELER UPHAM PC
Calder Plaza Bldg.
250 Monroe Ave., NW, Ste. 100
Grand Rapids, MI 49503
(616) 459-7100
james@wuattorneys.com
maximiuk@wuattorneys.com
***Attorneys for Defendant Liberty Mutual
Insurance Company***

s/William Gerald McElroy, Jr.

William Gerald McElroy, Jr.
ZELLE LLP
161 Worcester Rd., Ste. 502
Framingham, MA 01701
(781) 466-0706
WMcElroy@zelle.com

David W. Centner
CLARK HILL PLC
200 Ottawa Ave., NW, Ste. 500
Grand Rapids, MI 49503
Telephone: (616) 608-1100
Facsimile: (616) 608-1199
dcentner@clarkhill.com
*Attorneys for Defendant Employers
Insurance Company of Wausau*

CERTIFICATE OF SERVICE

I do hereby certify that on the 14th day of October, 2020, I served the foregoing document and this Certificate of Service to all Counsel of Record with the Clerk of the Court using the electronic court filing system, which will send notification of such filing to all Counsel of Record.

/s/ Carole D. Bos
Carole D. Bos